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chienhsuind 1 2 LEONARDO M. RAPADAS United States Attorney 3 FREDERICK A. BLACK DISTRICT COURT OF GUAM Assistant U.S. Attorney 4 Suite 500, Sirena Plaza SEP -6 2006 108 Hernan Cortez Ave. 5 Hagåtña, Guam 96910 MARY L.M. MORAN TEL: (671) 472-7332 **CLERK OF COURT** 6 FAX: (671) 472-7334 7 Attorneys for the United States of America 8 9 IN THE UNITED STATES DISTRICT COURT 10 FOR THE TERRITORY OF GUAM 11 12 13 UNITED STATES OF AMERICA, CRIMINAL CASE NO. 06-00037 Plaintiff. 14 **INDICTMENT** 15 VS. CONSPIRACY TO COMMIT FRAUD BY POSSESSING OVER CHIEN JUNG HSU, and 16 FIFTEEN COUNTERFEIT SHIH-WEI JHANG. ACCESS DEVICES

Defendants.

THE GRAND JURY CHARGES:

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From on and before August 25, 2006, in the District of Guam and elsewhere, the defendants herein, CHIEN JUNG HSU and SHIH-WEI JHANG, and other uncharged individuals unknown to the Grand Jury, did willfully and knowingly combine, conspire, confederate and agree together to: knowingly and with intent to defraud, possess more than fifteen counterfeit access devices, said possession of these counterfeit access devices affecting interstate and foreign commerce, by traveling to Guam from Taiwan and other Asia locations, in

[18 U.S.C. §§ 2, 371 & 1029(a)(3)]

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